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**SARGENT CONTROLS  
& Aerospace**

KAHR BEARING

DEPT. OF TRANSPORTATION  
DOCKETS  
99 JUL 20 PM 3:22

A **DOVER** DIVERSIFIED COMPANY

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07-15-99

U. S. Dept. of Transportation Dockets  
Docket No. [FAA-1999-58361 - 14]  
400 7<sup>th</sup>. ST. SW. Room Plaza 401  
Washington, DC 20590

To: Whom it may concern,

The following comments are in regard to the proposed modification to FAR 145. The management of our repair station has reviewed the proposed changes and agrees with the changes except for,

- A. 145.105 is too restrictive for arrangement of the internal workspace within a facility. Some repair stations are located within a building with a prime manufacturer and re-arrangement of the facility is a must for that facility. To disallow that move without the administrator's approval is an infringement on a business' right of organization. Far 145.2 1 and FAR145.35 should remain as they are.
- B. 145.159 (a) Employee training program is not defined regarding the time period recurrent training should take place. This would leave the requirement wide open for interpretation by all and could place undue requirements on some.
- C. 145.207 (b) A roster of inspection personnel, who may approve an article for return to service? A Company may decide that only certified repairmen may do this job. This should be clarified.
- D. 145.207(h)( 1) Name of the facility doing outside service? In our facility which is ISO9001 and AS9000 certified, this supplier base could fluctuate due to quality and delivery ratings. If required to list the supplier by name, the Manual would have to be revised and submitted every time the supplier base changed. Even a certified repair station for plating could be written off, if poor service or poor quality were encountered.
- E. 145.207(l) The listing of names of persons authorized to make changes to the manual would not be in the repair stations interest. When a promotion or transfer takes place, a new revision of the manual would have to be submitted for approval.

Sincerely,

Roland Steffes, Sr. Q.E. / Repairman